

1 ROBERT T. EGLET
2 Nevada Bar No. 3402
3 TRACY A. EGLET
4 Nevada Bar No. 6419
5 BRITTNEY R. GLOVER
6 Nevada Bar No. 15412
7 **EGLET ADAMS EGLET**
8 **HAM HENRIOD**
9 400 South 7th Street, #400
10 Las Vegas, Nevada 89101
11 eservice@egletlaw.com

ROBERT T. EGLET
Nevada Bar No. 3402
TRACY A. EGLET
Nevada Bar No. 6419
ROBERT M. ADAMS
Nevada Bar No. 6551
ARTEMUS W. HAM, IV
Nevada Bar No. 7001
JOEL D. HENRIOD
Nevada Bar No. 8492
CHAD M. GOLIGHTLY
Nevada Bar No. 5331
EGLET ADAMS & GOLIGHTLY, PLLC
400 South 7th Street, 4th Floor
Las Vegas, Nevada 89101

11 CHAD M. GOLIGHTLY, ESQ.
12 Nevada Bar No. 5331
13 **LAW OFFICES OF CHAD M.**
14 **GOLIGHTLY, LTD**
15 8560 S. Eastern Ave., Ste. 240
16 Las Vegas, NV 89123
17 *Attorneys for Plaintiff*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

18 TIFFANY HEDGEPEETH, an individual,
19
20 Plaintiff,
21
22 vs.

23 MEIBORG BROS, INC., an Illinois
24 Corporation; MEIBORG, INC., an Illinois
25 Corporation; JAMES RAY COX, an individual;
26 DOES I through X, inclusive; ROE BUSINESS
27 ENTITIES I through X, inclusive;
28
29 Defendants.

CASE NO.: 2:24-cv-00045-CDS-MDC

AMENDED STIPULATION AND
[PROPOSED] ORDER TO EXTEND
DISCOVERY AND PRE-TRIAL
DEADLINES (THIRD REQUEST)

27 In accordance with Local Rules of Practice for the United States District Court for the
28 District of Nevada LR 26-3, Plaintiff, TIFFANY HEDGEPEETH, by and through her attorneys,



1 Robert T. Eglet, Esq., Tracy A. Eglet, Esq., and Brittney R. Glover, Esq. of the law firm of
2 EGLET ADAMS EGLET HAM HENRIOD; and Defendants, MEIBORG BROS, INC.,
3 MEIBORG, INC. and JAMES RAY COX, by and through their attorneys, Mark R. Smith, Esq.
4 and Robert L. Thompson, Esq. of the law firm of RESNICK & LOUIS, P.C., hereby stipulate
5 and agree to an extension of all discovery and pre-trial deadlines by ninety (90) days. The parties
6 propose the following revised discovery plan.

7 **I. DISCOVERY COMPLETED**

8 On January 5, 2024, Defendants removed this case to Federal Court.

- 9 1. On February 2, 2024, the parties attended the FRCP 26(f) discovery conference.
- 10 2. Plaintiff served her Initial Disclosures on February 15, 2024.
- 11 3. Defendant produced their Initial Disclosures on February 16, 2024.
- 12 4. Defendant Meiborg Bros, Inc. served its First Set of Interrogatories, Requests for
13 Production and Requests for Admission to Plaintiff on February 16, 2024.
- 14 5. Plaintiff served her First Set of Interrogatories, Requests for Production and
15 Requests for Admission to Defendant James Ray Cox on February 20, 2024.
- 16 6. Plaintiff served her First Set of Interrogatories, Requests for Production and
17 Requests for Admission to Defendant Meiborg Bros, Inc. on February 20, 2024.
- 18 7. Plaintiff served her First Set of Interrogatories, Requests for Production and
19 Requests for Admission on Defendant Meiborg, Inc. on February 20, 2024.
- 20 8. Plaintiff served her first supplemental disclosures on March 22, 2024.
- 21 9. Plaintiff served responses to Defendant Meiborg Bros, Inc.'s First Set of
22 Interrogatories and Requests for Admissions on April 5, 2024.
- 23 10. Plaintiff served her second supplemental disclosures on June 11, 2024.
- 24 11. Plaintiff served her third supplemental disclosures on July 2, 2024.
- 25 12. Plaintiff served her responses to Defendant Meiborg Bros, Inc.'s First Set of
26 Requests for Production of Documents on Jul 10, 2024.
- 27 13. Plaintiff served her fourth supplemental disclosures on July 18, 2024.



1 14. Plaintiff served her second requests for production of documents to Defendants
2 Meiborg Bros, Inc. and Meiborg, Inc. on August 8, 2024.

3 15. Defendant served their first supplemental disclosures on August 29, 2024.

4 16. Defendant served their second supplemental disclosures on September 6, 2024.

5 17. Defendant James Ray Cox served his responses to Plaintiff's first set of requests
6 for production of documents on September 6, 2024.

7 18. Defendants Meiborg, Inc. and Meiborg Bros, Inc. served their responses to
8 Plaintiff's first set of requests for production of documents on September 6, 2024.

9 19. Defendant James Ray Cox served his responses to Plaintiff's first set of requests
10 for admission and interrogatories on September 9, 2024.

11 20. Defendants Meiborg, Inc. and Meiborg Bros, Inc. served their responses to
12 Plaintiff's first set of requests for admissions and interrogatories on September 11, 2024.

13 21. Defendant served their third supplemental disclosures on September 25, 2024.

14 22. Defendant served their fourth supplemental disclosures on October 9, 2024.

15 23. Plaintiff underwent the FRCP Rule 35 Examination on October 18, 2024.

16 24. Defendant Meiborg, Inc. served their responses to Plaintiff's second set of requests
17 for production of documents on December 2, 2024.

18 25. Defendant James Ray Cox was deposed on December 10, 2024.

19 **II. DISCOVERY THAT REMAINS TO BE COMPLETED**

20 The parties believe the following discovery remains to be completed:

- 21 1. Obtain authorizations from Plaintiff to request medical and billing records;
- 22 2. Additional written discovery requests to Defendants;
- 23 3. The deposition of Plaintiff;
- 24 4. The deposition of Defendants Meiborg Bros, Inc. FRCP 30(b)(6) Designee(s) ;
- 25 5. The deposition of Defendant Meiborg, Inc.'s FRCP 30(b)(6) Designee(s);
- 26 6. Depositions of Plaintiff's treating medical providers;
- 27 7. Any other party and witness depositions;
- 28

8. Subpoena duces tecum to third parties;
9. Designations of Initial and Rebuttal Expert Witnesses;
10. Depositions of Expert Witnesses;
11. Additional discovery as the parties deems necessary.

III. REASONS WHY DISCOVERY WAS NOT COMPLETED PRIOR TO THE CUT-OFF

On June 20, 2024, this Honorable Court granted the parties' Stipulation and Order to Extend Discovery and Pre-Trial Deadlines (ECF No. 27) to allow Eglet Adams Eglet Ham Henriod to review all materials to get up to speed on this case and for the parties to diligently and effectively continue their discovery efforts. As shown above, the parties have been diligent in their discovery efforts by requesting and serving written discovery, serving supplemental disclosures, conducting Plaintiff's FRCP 35 Examination, and deposing Defendant James Ray Cox.

However, the parties still have additional discovery to conduct. Specifically, Plaintiff has endured delays in her medical treatment that will impact the timeliness of designating expert witnesses before the current initial expert disclosure deadline. Additionally, Plaintiff intends to serve subpoena duces tecum to third parties and additional written discovery because of testimony elicited from Defendant James Ray Cox's deposition. The parties still need to finalize the stipulate confidentiality order, which will result in the production of confidential documents that will need to be reviewed. The parties also need to conduct additional party and witness depositions. Based on these reasons, the parties respectfully submit the reasons set forth above constitute good cause for this extension.

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**IV. CURRENT AND PROPOSED SCHEDULE FOR COMPLETING ALL
REMAINING DISCOVERY**

Description	Current Date	Proposed Date
Amend Pleadings and Add Parties	December 26, 2024	March 26, 2025
Initial Expert Disclosures	January 27, 2025	April 28, 2025
Rebuttal Expert Disclosures	February 24, 2025	May 28, 2025
Close of Discovery	March 24, 2025	June 27, 2025
Dispositive Motions	April 22, 2025	July 28, 2025
Joint Pretrial Order	May 22, 2025	August 27, 2025

The Parties aver that this request for extension of discovery and pre-trial deadlines is made by the parties in good faith and not for the purpose of delay.

IT IS SO STIPULATED.

DATED this 20th day of December 2024.

DATED this 20th day of December 2024.

**EGLET ADAMS EGLET HAM
HENRIOD**

RESNICK & LOUIS, P.C.

/s/Brittney R. Glover, Esq.
ROBERT T. EGLET, ESQ.
Nevada Bar No. 3402
TRACY A. EGLET, ESQ.
Nevada Bar No. 6419
BRITTNEY R. GLOVER, ESQ.
Nevada Bar No. 15412
*Attorney for Plaintiff,
Tiffany Hedgepeth*

/s/ Robert L. Thompson, Esq.
MARK R. SMITH, ESQ.
Nevada Bar No. 11872
ROBERT L. THOMPSON, ESQ.
Nevada Bar No. 9920
*Attorneys for Defendants,
Meiborg Bros., Inc., Meiborg, Inc.,
and James Ray Cox*

Hedgepeth v. Meiborg Bros, Inc. et al.
Case No.: 2:24-CV-00045-DCS-MDC

Amended Stipulation and [Proposed] Order To Extend Discovery Deadlines and Pre-Trial Deadline (3rd Request)

ORDER

Based upon the foregoing stipulation of counsel and good cause appearing, **IT IS HEREBY ORDERED, ADJUDGED, AND DECREED:**

1. The discovery cut- off shall be **Friday, June 27, 2025.**
2. **Amending the Pleading and Adding Parties.** The lase date for filing motions to amend pleadings or to add parties shall not be later than 90 days prior to the close of discovery. In this action, the last date to file motions to amend the pleadings or add parties shall be **Wednesday, March 26, 2025.**
3. **FRCP 26(4)(2) Disclosure (Experts).** The last day to disclose expert witnesses shall be 60 days before the discovery cut-off date. In this action, the last date to disclose experts shall be **Monday, April 28, 2025.** The date for the disclosure of rebuttal expert witnesses shall be 30 days after the initial disclosure of experts. In this action, the last date to disclose rebuttal experts shall be **Wednesday, May 28, 2025.**
4. **Dispositive Motions.** The last date to file dispositive motions shall not be later than 30 days after the discovery cut-off date. In this action, the last date to file dispositive motions shall be **Monday, July 28, 2025**
5. **Joint Pretrial order.** The joint Pretrial Order shall be filed no later than 30 days after the date set for filing dispositive motions. In this action, the joint pretrial order shall be filed on or before **Wednesday, August 27, 2025.**
6. **FRCP 26(a)(3) Disclosures.** The disclosures required by FRCP 26(a)(3) and any objections thereto shall be included in the Joint Pretrial Order.

IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE

DATED: 12-30-24